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DIANE KRAUSE-HALE

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 * * *

11 DIANE KRAUSE-HALE, an individual,
12 Plaintiff,

CASE NO. 2:22-CV-00184-JCM-DJA

13 vs.

14 CSAA GENERAL INSURANCE
COMPANY, a foreign business entity; DOES I
15 through XX, inclusive; and ROE BUSINESS
ENTITIES I through XX, inclusive,
16 Defendants.

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT
(First Request)**

18 Plaintiff DIANE KRAUSE-HALE, by and through her attorneys of record, the law firm of
19 BERTOLDO BAKER CARTER SMITH & CULLEN, and Defendant CSAA GENERAL INSURANCE
20 COMPANY, by and through their attorneys of record, the law firm of HALL JAFFE & CLAYTON
21 hereby stipulate and agree as follows:
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On May 17, 2022, Defendant filed a Motion for Summary Judgment (Document 12). The present deadline to file an Opposition to the Motion is June 7, 2022. Recently, lead counsel for Plaintiff, Steven M. Baker, Esq., unexpectedly had to retire from the practice of law for medical reasons. Paul R.M Cullen, Esq. has taken over handling this matter. On May 27, 2022, Mr. Cullen and Defendant's counsel Riley Clayton, Esq. discussed the instant Motion. Mr. Cullen requested additional time to review the file and prepare a proper response. Mr. Clayton is presently preparing for trial which begins on June 1, 2022, and agreed to the extension. Good cause exists for the extension to respond to a case concluding Motion in light of Mr. Baker's recent departure.

IT IS HEREBY STIPULATED AND AGREED that the time within which to file Plaintiff's Opposition to Defendant's Motion for Summary Judgment (Document 12), is extended to June 30, 2022.

DATED this 31st day of May, 2022

**BERTOLDO BAKER CARTER
SMITH & CULLEN**

HALL JAFFE & CLAYTON

By: /s/ Paul R.M. Cullen, Esq.
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ORDER

IT IS HEREBY ORDERED that the time to file an Opposition to Defendant's Motion for Summary Judgment (Document 12) is hereby extended to June 30, 2022.

DATED : June 1, 2022


UNITED STATES DISTRICT JUDGE

Respectfully Submitted

**BERTOLDO BAKER CARTER
SMITH & CULLEN**

/s/ Paul R.M. Cullen, Esq.
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